

Ames Laboratory		Procedure	10200.041
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Trend Analysis of ES&H Concerns

This procedure provides a description of the Ames Laboratory Trend Analysis of ES&H Concerns, including analysis to be performed, trend comparisons to past years and corrective actions as a result of the analysis as required by the Ames Laboratory Environment, Safety, Health and Assurance Program Manual, Section 10, Assessments.

Comments and questions regarding this procedure should be directed to the contact person listed below:

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Sign-off Record:

Approved by: _____ Date: _____
ESH&A Manager

Note: This document's Sign-off Record is maintained in the ESH&A Documents & Records Office, 151 TASF.

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1.0 Revision/Review Log

This document will be reviewed once every three (3) years as a minimum.

Revision <u>Number</u>	Effective <u>Date</u>	Contact <u>Person</u>	Pages <u>Affected</u>	Description of Revision
0	5/01/99	S. Nelson	All	Original Document
1	3/15/02	S. Nelson	All	G:\Doc&Recs\DCP\Revisions Descriptions\102_041Rev1
2	11-1-03	S. Nelson	2,4&5	G:\DOC&RECS\DCP\Revision Descriptions\Procedure 102_041 rev2
3	8-1-07	S. Nelson	All	G:\DOC&RECS\DCP\Revision Descriptions\Procedures 10200.041 rev3

2.0 Purpose and Scope

The purpose of the Trend Analysis of ES&H Concerns is to determine causal categories of all ES&H concerns and to target those issues to reduce or eliminate the concerns in a timely manner. The following are the feedback and improvement mechanisms utilized to identify ES&H concerns:

- Independent Walk-Through Procedure (#10200.021)
- Accidents, Incidents and Employee Safety Concerns: Classification and Investigation (#10200.038)
- Injury/Illness Data (CAIRS)
- Event Reporting Issues (i.e., Occurrence Reporting, Noncompliance Tracking System (NTS), Incidents of Security Concern (ISC) and Ames Local Events.
- Discrepancy Reports Procedure (#10200.064)
- Causal factors as identified via causal analysis.

The Trend Analysis of ES&H Concerns is not intended to produce a burdensome administrative program or place unrealistic expectations on managers / supervisors / group leaders. However, systemic deficiencies identified during this analysis need to be resolved.

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3.0 Performance of Trend Analysis

3.1 Mechanisms to Identify ES&H Concerns

3.1.1 Independent Walk-Throughs (Procedure 10200.021)

It is the responsibility of the Group/Section or Program/Department to perform the actions necessary to closeout the concerns identified by the Independent Walk-Through according to the requirements for the Quality Assurance (QA) rating assigned to the observation. The Group/Section or Program/Department responsible for the corrective actions taken to closeout the concern shall document the response on the Walk-Through Record Form (Form 10200.026) or other form. This information is sent to ESH&A for closure and a copy maintained by the Group/Section or Program/Department. Verification of the closeout shall be performed by the appropriate ES&H Coordinator or QA Coordinator. All concerns are tracked utilizing the Ames Laboratory Corrective Action Tracking System (ALCATS) Database System.

3.1.2 Accidents, Incidents, and Employee Safety Concerns: Classification and Investigations (Procedure 10200.038)

Accidents, Incidents and Employee Safety Concerns: Classification and Investigations include odor concerns, chemical spills, defective operation of equipment, housekeeping, public safety, employee observation, etc. This information is documented on the Incident & Concern Reporting Form, (Form 10200.088). The concerns are investigated and corrected (if feasible). The results of the investigation are communicated to the individual(s) who raised the concern. All concerns are tracked utilizing the ALCATS Database System.

3.1.3 Injury/Illness Data

The total injuries and illnesses are logged by Occupational Medicine. This information is used to complete the OSHA 300 Log of Recordable Injuries and Illnesses. The information can be manipulated by responsible manager, program, type of injury / illness, severity of injury and if recordable by OSHA.

Injuries and illnesses are discussed by the Industrial Hygienist, Fire Safety Specialist, Industrial Safety Specialist, the Occupational Medicine Administrator and the Occupational Medicine Nurse on a monthly and annual basis for potential trends. Corrective Actions are tracked utilizing the ALCATS Database System.

3.1.4 Occurrence Reporting and Processing of Operations Information (ORPS)

Occurrence Reporting and Processing of Operations Information (ORPS) is to assure that Ames Laboratory management and DOE officials are kept fully and currently informed of all events

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and conditions which could affect the health and safety of the public, endanger the health and safety or workers, have a noticeable adverse effect on the environment or seriously impact the intended purpose of the laboratory. All concerns are tracked utilizing the ALCATS Database System as well as the ORPS System.

3.1.5 Noncompliance Tracking System (NTS)

The Noncompliance Tracking System is used to document and communicate to Ames Laboratory management and DOE officials of a failure to comply with applicable Nuclear Safety or Worker Safety and Health requirements. All Notices of Violation are tracked on the NTS System as well as the internal ALCATS Database System.

3.1.6 Incidents of Security Concern (ISC)

Incidents of Security Concern are those actions, inactions, or events that that pose a threat to national security and /or DOE assets, create a potentially serious or dangerous security situations, degrade the effectiveness of the safeguards and security program or adversely impact the ability of organizations to protect DOE safeguards and security issues. All concerns are tracked utilizing the ORPS System as well as the internal ALCATS Database System.

3.1.7 Ames Local Events

Ames Local Events are those not meeting the threshold of ORPS, NTS or ISC. Ames Local Events are tracked just as ORPS, NTS and ISC in the ALCATS Database System.

3.2 Discrepancy Reports (Procedure 10200.064)

Discrepancy reports are generated by the Plant Protection Section (PPS) during tours. PPS staff looks for both security issues and safety issues and report them daily. This information is categorized by the type of discrepancy and the responsible manager, supervisor or group leader. Examples of issues reported include but are not limited to:

- Heat generating equipment left on unattended (coffee pots, soldering irons, hot plates, etc.)
- Unsecured gas cylinders
- Excessive combustible materials
- Unsecured doors
- Missing or outdated door cards
- Uncapped gas cylinders
- Etc.

Discrepancy reports are investigated and closed on a daily basis (M-F, normal week) by the Fire Safety Specialist or the Industrial Safety Specialist. Complete Discrepancy Reports are generated on a monthly and annual basis.

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3.3 Events and Causal Categories

It is the responsibility of the Safety Specialist to review and analyze the data from the feedback mechanisms (Independent Walk throughs, Employee Concerns, Injury/Illness Data, ORPS, NTS, ISC's, Ames Local's and Discrepancy Reports). ORPS, NTS, and ISC are also assigned causal categories from the Causal Analysis Tree (DOE G 231.1-2) used as another tool for review and analysis.

3.4 Reviews and Analysis of Data

The Safety Specialist prepares for the a Mid-Year and Year-End Self Assessment Report a trend analysis of the feedback mechanisms which denotes common occurrences or prevailing conditions with previous years.

In addition, per the DOE Occurrence Reporting and Processing of Operations Information (ORPS) Manual M 231.1-2 and Occurrence Reporting and Performance Analysis Guide G 231.1-1, quarterly performance analysis and identification of recurring occurrences are conducted for events during the previous 12 months. The quarterly performance analysis includes a review of data from Injuries and Illnesses, Occurrences (ORPS), Noncompliance Tracking System (NTS), Incidents of Security Concern (ISC) and Ames Local Events.

4.0 Post Performance

As a result of the review and analysis of data, corrective actions may be implemented to address the changes needed such as written programs, revise written programs, develop or modify existing training, completion of topical appraisals, perform additional audits, further investigations, etc. The results of the review and analysis are a tool utilized for measurement of safety performance.

The analysis of data and the proposed corrective actions are communicated to the ESH&A Staff, Executive Council and Chicago Operations.